

Berman, S.

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

SANDRA LIFSCHITZ, Individually and on Behalf
of All Others Similarly Situated,

Plaintiff,

v.

HEXION SPECIALTY CHEMICALS, INC.,
CRAIG O. MORRISON and JOSHUA J. HARRIS,

Defendants.

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: *7/2/08*
DATE FILED: *7/2/08*

Civil Action No: 08 Civ. 6394(RMB)

STIPULATION AND ~~PROPOSED~~ ORDER

WHEREAS, the complaint in the above-captioned action (the "Action") is governed by the provisions of the Private Securities Litigation Reform Act of 1995 (the "PSLRA");

WHEREAS, the PSLRA provides a procedure for consolidating federal securities class actions, whereby the Court will appoint a lead plaintiff and approve its selection of lead counsel;

WHEREAS, upon being appointed by the Court, the lead plaintiff will file a consolidated amended complaint superseding the present complaint in this Action; and

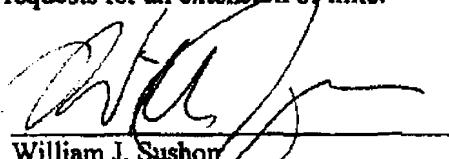
WHEREAS, the parties wish to avoid having Hexion Specialty Chemicals, Inc., Craig O. Morrison and Joshua J. Harris (collectively, the "Defendants") move, answer or otherwise respond until the consolidated amended complaint is filed;

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

1. Defendants shall not be required to answer or otherwise respond to, and are hereby expressly relieved from answering or otherwise responding to, the current complaint in this Action. Defendants shall move, answer or otherwise respond to the Consolidated Amended Complaint within sixty (60) days of service upon Defendants' counsel of the Consolidated Amended Complaint.

2. There have been no previous requests for an extension of time.

Dated: August 25, 2008
New York, New York



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Counsel for Defendant Joshua J. Harris

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for the undersigned parties to this action, as follows:

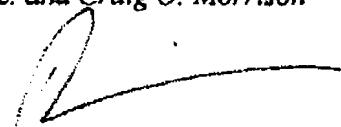
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Counsel for Plaintiff

SO ORDERED:


UNITED STATES DISTRICT JUDGE

9/2/08

1